REMARKS

Claims 1-41 are currently pending. Claims 1, 6, 11, 19, 29 and 33 have been amended, without acquiescence or prejudice to pursue the original claims in a related application. No new matter has been added.

This communication is in response to the Office Action mailed on September 28, 2007. In that Office Action, the Examiner considered the arguments of the September 14, 2007 amendment and reply and deemed that they were not persuasive. The Examiner rejected claims 1-41 under 35 U.S.C. § 102(b) as being anticipated by newly cited art by Lee et al., U.S. Patent No. 6,430,731 (hereinafter "Lee").

Rejections Under 35 U.S.C. § 102

Claims 1-41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lee. Applicant respectfully traverses.

Independent claim 1 recites the following limitations (emphasis added):

> determining at least a plurality of different arrival times and a plurality of different slews from **a plurality of timing events propagated to an input of a gate** based on a timing model of the gate;
> _selecting_ one of the plurality of timing events propagated to the input of the gate as a worst case timing event based on at least a non-predetermined combination of an arrival time in the plurality of different arrival times and a slew in the plurality of different slews of the plurality of timing events; and
> storing information related to the worst-case timing event.

Applicant respectfully submits that Lee fails to disclose each and every limitation of the present claims in a manner as recited therein.

Lee is directed to methods and apparatus for performing slew dependent signal bounding for signal timing analysis. Lee discloses signal timing analysis with respect to a circuit having at least one gate. In one aspect, Lee includes the step of determining a first constraint slew sensitivity value and a second constraint slew sensitivity value for the at least one gate according to a specified bounding technique. Then, a _representative signal_ for the gate is _computed_ in accordance with the first and second values including an arrival time and slew rate, wherein the representative signal bounds signal paths by bounding a maximum slew sensitivity path and a

minimum slew sensitivity path. ***Such a representative signal may be computed for a worst case late-mode analysis and/or a best case early-mode analysis.***

Specifically, Lee discloses in step 150 and 160 in column 15 lines 44-48 a calculated representative signal and not an actual signal.

> Signals ***representing*** the arrival time and slew are ***computed*** at the gate output according to equations (1) and (2) above. Then, in step 160, the ***representative*** signal (s, a) is ***computed*** with the arrival time and slew according to equation (26) above. (Emphasis added)

Thus, Lee **calculates** the worse case timing event and does <ins>**not**</ins> **select** a timing event <ins>propagated to the input of the gate</ins> as claimed.

In contrast, claim 1 explicitly recites "<ins>selecting</ins> one of the plurality of timing events <ins>propagated to the input of the gate</ins> as a worst case timing event (emphasis added)." The timing events include a plurality of different arriving times and different skews at a gate. Lee merely calculates a representative signal for a gate and does not select one of a plurality of timing events for a gate as claimed. For at least these reasons, it is respectfully submitted that independent claim 1 is not anticipated by the Lee reference.

For at least these same reasons, it is respectfully submitted that independent claims 6, 11, 19, 29 and 33 are likewise not anticipated by the cited references because they recite a limitation substantially similar to the limitation identified discussed with respect to claim 1.

Since the remaining claims depend from these independent claims 1, 6, 11, 19, 29 and 33, respectively, these remaining dependent claims are also not anticipated and are therefore allowable over the cited references for the same reasons discussed above with respect to claim 1.
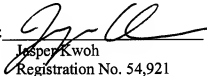
CONCLUSION

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-4047,** referencing billing number **7017522001.** The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-4047,** referencing billing number **7017522001.**

Respectfully submitted,

Bingham McCutchen LLP

Dated: December 28, 2007

By:

Jasper Kwoh

Registration No. 54,921

Three Embarcadero Center
San Francisco, California 94111
Telephone: (650) 849-4820
Facsimile: (650) 849-4800